

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed April 21, 2004. Various claims have been amended to further clarify what the inventors believe to be the invention. Claims 5, 21, 40, 54, 67, and 74 have been cancelled without prejudice or disclaimer. Applicants respectfully request reconsideration and favorable action in this case.

In the Specification

The Examiner objects to the specification relating to the absence of status information on the applications listed on page 1 of the Application. Applicants have updated this information as requested by the Examiner.

Claim Objections

The Examiner objects to Claims 2-7, 11, 14-16, 19-22, 27, 31, 33, 35-39, 50-65, 67-72, 75, and 77-78 due to various informalities. Applicants have amended these claims as requested by the Examiner, with the exception of Claims 3, 19, and 53 and Claims 31 and 33.

With respect to Claims 3, 19, and 53, the Examiner states on page 3, lines 2-7 of the Office Action that the term "a telephony device" in these claims refers back to the term "telephony devices" in their respective independent claim. However, the term "a telephony device" in these claims (as identified by the Examiner) further modifies the "device" from which the recited call request was received (which is not necessarily a telephony device or the plurality of telephony devices associated with the number in the call request).

With respect to Claims 31 and 33, the Examiner states on page 3, lines 14-16 of the Office Action that the term "a line control process" in these claims should read "the line control process." Applicants have amended these claims to address the Examiner's objections, but not as specified by the Examiner. Applicants submit that the amendments to these claims remove the Examiner's objection to the claims.

Accordingly, Applicants respectfully request that the objections to Claims 2-7, 11, 14-16, 19-22, 27, 31, 33, 35-39, 50-65, 67-72, 75, and 77-78 be withdrawn and that these claims be allowed.

Section 112 Rejections

The Examiner rejects Claims 20, 34, 36-49, and 58-72 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Applicants have amended Claims 20, 39, 46, 59, 63 and 58 to address the Examiner's rejections. Favorable action is thus respectfully requested with respect to these claims and their dependents.

With respect to Claim 34, Applicants direct the Examiner to Claims 31 and 32 for a recitation of the association of the first device process and the first line control database with the first call manager. With respect to Claim 36, the "plurality of call managers" recited in line 8 may include, or may not include, the call manager recited in line 1. The claim is meant to cover either situation. Furthermore, Applicants have amended Claim 36 to address the Examiner's rejection relating to the first device process. With respect to Claim 72, this claim does not include the term "the packet-based network." Applicants assume the Examiner meant to refer to Claim 66, and Applicants have amended Claim 66 accordingly.

Accordingly, Applicants respectfully request that the rejections of Claims 20, 34, 36-49, and 58-72 under 35 U.S.C. § 112, second paragraph, be withdrawn and that these claims be allowed.

Allowable Subject Matter

Applicants appreciate the Examiner's acknowledgement that Claims 34, 40-41, 46-49, 58-65, and 67-72 would be allowable if rewritten to overcome the rejections under 35 U.S.C. § 112 and if rewritten in independent form. Similarly, Applicants appreciate the Examiner's acknowledgement that Claims 5, 7, 12-16, 21, 21-26, 28, 31-33, 54, 57, 74, and 76-78 would be allowable if rewritten in independent form. As noted below, independent Claims 1, 17, 36, 50, 66, and 73 have been amended to include the limitations of Claims 5, 21, 40, 54, 67, and 74, respectively.

Section 102 Rejections

The Examiner rejects Claims 1-4, 6, 8-11, 17-20, 22-24, 27, 29-30, 36-39, 42-45, 50-53, 55-56, 66-67, 68, 73-74, and 75 under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent Number 5,652,866 issued to Aldred et al.

Independent Claims 1, 17, 36, 50, 66, and 73 have been amended to include the limitations of Claims 5, 21, 40, 54, 67, and 74, respectively. Since the Examiner has indicated that Claims 5, 21, 40, 54, 67, and 74 would be allowable if rewritten in independent form, Claims 1, 17, 36, 50, 66, and 73 should now be in condition for allowance. Therefore, Applicants respectfully request reconsideration and allowance of Claims 1, 17, 36, 50, 66, and 73, all claims that depend from these independent claims.

Conclusion

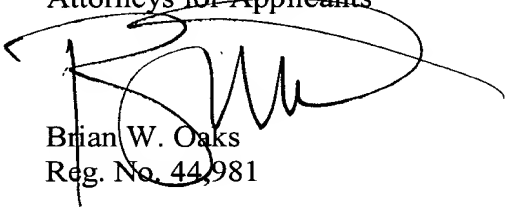
Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Brian W. Oaks, Attorney for Applicants, at the Examiner's convenience at (214) 953-6986.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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